

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 04-40002-CBS
)	
)	
JOSEPH DiFLUMERA)	
)	

**DEFENDANT'S MOTION TO FURTHER
MODIFY RELEASE CONDITIONS**

Defendant Joseph DiFlumera, by and through his attorney, hereby moves the Court to modify the release conditions outlined in the Order Setting Conditions of Release dated October 27, 2003.

1. DiFlumera hereby requests that he be permitted to travel to New York with the following conditions:
 - a. That DiFlumera notify Pretrial Services of the dates of his travel, whom he intends to meet with while in New York, and the purpose of the meeting(s); and
 - b. That DiFlumera not travel to New York unless and until Pretrial Services approves the trip.
2. Assistant United States Attorney Laura Kaplan has reviewed this motion and hereby assents to it.
3. DiFlumera requests that all other conditions of the Order Setting Conditions of Release remain the same.

WHEREFORE, DiFlumera respectfully requests that this motion be allowed.

By his attorney,

/s/ Paul V. Kelly
Paul V. Kelly
Nicholas A. Klinefeldt
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Date: December 15, 2004